

HEARING DATE: AUGUST 22, 2019
HEARING TIME: 10:00 A.M.

TARTER KRINSKY & DROGIN LLP
Attorneys for Alpine Creations Ltd.
1350 Broadway, 11th Floor
New York, New York 10018
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Rocco A. Cavaliere, Esq.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: :
: Chapter 11
SEARS HOLDINGS CORPORATION, *et. al.*¹, :
: Case No. 18-23538 (RDD)
Debtor. : (Jointly Administered)
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**NOTICE OF MOTION OF ALPINE CREATIONS LTD. TO ALLOW
AND COMPEL PAYMENT OF ADMINISTRATIVE EXPENSE
CLAIM UNDER 11 U.S.C. §§ 503(b)(1) AND 503(b)(9)**

TO: THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE

PLEASE TAKE NOTICE, that upon the motion (the “Motion”) dated July 26, 2019,

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Alpine Creations Ltd. (“Alpine”) shall move before the Honorable Robert D. Drain, United States Bankruptcy Judge, in his courtroom at the United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601, on **August 22, 2019 at 10:00 a.m.** or as soon thereafter as counsel may be heard, for an order allowing and compelling the Debtors to pay Alpine its administrative expense claims pursuant to sections 503(b)(1) and 503(b)(9) of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief requested in the Motion shall be (i) filed with the Clerk of the Bankruptcy Court on the Court’s ECF system; and served upon (ii) Tarter Krinsky & Drogin LLP, 1350 Broadway, 11th Floor, New York, New York 10018, Attn: Rocco Cavaliere, Esq. and (iii) delivered to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, so that same are received on or before **5:00 p.m. on August 15, 2019.**

Dated: New York, New York
July 26, 2019

TARTER KRINSKY & DROGIN LLP
Attorneys for Alpine Creations Ltd.

By: s/ Rocco A. Cavaliere
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